



# NATIONAL TRANSLATOR ASSOCIATION

*OUR AIM – TO PROVIDE FM and TV SIGNALS in EVERY HOME*

Office of the President, 2355 Ranch Drive, Westminster, CO 80234 303-465-5742 e-mail stcl@comcast.net

October 29, 2008

Via electronic filing

Honorable Kevin J. Martin, Chairman  
Federal Communications Commission  
Washington, DC 20554

RE: Unlicensed Operation in the TV Broadcast Bands; Additional Spectrum for  
Unlicensed Devices Below 900 MHz and in the 3 Ghz Band.  
ET Docket Nos. 04-186 and 02-380

Dear Chairman Martin:

The National Translator Association is made up of TV and FM translator owners, service people and others concerned with providing free over-the-air TV in areas that do not receive adequate direct reception.

Our membership is predominately from rural areas. In principle we would appreciate better broadband internet service in our areas, but it is not a pressing matter. This letter is specifically to point out that *we do not want improved internet service at the expense of interference to free-over-the-air TV.*

In our earlier comments in this matter we stated that based on our cumulative experience in dealing with weak TV signals we were extremely skeptical that any protection plan based on signal sensing would provide the required degree of protection.

The proponents have almost unlimited resources and skilled technical staffs but have struggled to produce demonstration equipment. Even with their best efforts they have not provided demonstration equipment that establishes the feasibility of signal sensing.

What the tests do prove is that any equipment which provides adequate protection to over-the-air TV reception with or without geo-location added is going to be extremely complex.<sup>1</sup>

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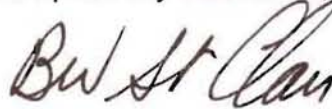
<sup>1</sup>It is axiomatic that signal sensing process time increases as the system looks for lower and lower signals. The reason is that such sensing is a correlation process based on a comparison between a detected signal and known signal characteristics or signatures. The greater the sensitivity requirement the longer the required comparison time. There is a

Interference to digital signals is particularly insidious because the digital TV set does not display the interference. It simply fails to display a picture. We think that introducing any new service that has the slightest possibility of causing interference to digital reception will inhibit the public's acceptance of digital TV as viable. It is probably going to take a couple of years before the majority of the digital home reception problems are solved. In our opinion it will be detrimental to the digital conversion if a complication such as presented by the proposed unlicensed operation is introduced until the public is familiar and comfortable with digital reception.

Based on our long experience with delivering over-the-air TV in rural areas we are skeptical that the proposed white spaces plan can ever operate with an appropriate degree of protection to over-the-air TV reception. If such operation is authorized and our concerns become reality it is hard to see how the plan could be undone.

We urge the Commission to avoid taking a chance on an unproven plan that cannot be reversed. but at a minimum the proposal should be put on hold until the public has experience with and solves most of the problems associated with home digital reception.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "B. W. St. Clair". The signature is fluid and cursive, with a small mark to the right of the final letters.

B. W. St. Clair  
President

cc: Commissioners Copps, Adelstein, Tate & McDowell  
Filed as ex-parte comment ET Docket Nos. 04-186 and 02-380.

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question as to whether the public will tolerate the time required for a valid correlation.